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9
 10 Attorneys for
 11 Stirling Mortimer Global Property Fund PCC Limited

12 **UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA**

13
 14 In re:) Case No.: 13-13969-BTB
 15 Regal Property Holdings, Inc.)
 16 Richard N. Roberts and Jane S. Roberts,) Chapter 11
 17)
 18 Debtors.) Joint Administration With:
 19) Case No.: 13-13968-BTB
 20)
 21) Hearing: January 23, 2014, at 2:00 p.m.,
 22) and January 24, 2014, at 9:00 a.m.
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25 **STIPULATION CONTINUING VOTING, OBJECTION, AND**
REPLY DEADLINES WITH RESPECT TO THE DEBTORS' PLAN

26 Stirling Mortimer Global Property Fund PCC Limited ("Stirling"), by and through its counsel
 27 of record, Parsons Behle & Latimer, and the above-captioned debtors and debtors-in-possession (the
 28 "Debtors"), by and through their counsel of record, The Schwartz Law Firm, Inc. and Lionel Sawyer
 29 & Collins, hereby stipulate and agree as follows:

30 WHEREAS, on July 19, 2013, the Debtors filed their: (i) Disclosure Statement for their
 31 Chapter 11 Plan of Liquidation (Docket No. 143); and (ii) motion for approval of certain procedures
 32 related to the Debtors' Plan and Disclosure Statement (the "Procedures Motion") (Docket No. 150);

33 WHEREAS, on October 28, 2014, the Court entered the Order (i) approving the disclosure
 34 statement; (ii) approving the form of ballots and proposed solicitation and tabulation procedures for

1 the Plan; (iii) fixing December 13, 2013, as the voting deadline (the “**Voting Deadline**”) with respect
 2 to the Plan, (iv) prescribing the form and manner of notice thereof; (v) fixing December 13, 2013, as
 3 the last day for filing objections to the Plan pursuant to Bankruptcy Rules 3020(b) and 9006(c)(1)
 4 (the “**Confirmation Objection Deadline**”); (vi) scheduling a hearing to consider confirmation of the
 5 Plan (the “**Confirmation Hearing**”) on January 23, 2014, at 2:00 p.m., and January 24, 2014, at 9:00
 6 a.m., (vii) approving The Schwartz Law Firm, Inc. as the Debtors’ solicitation and tabulation agent;
 7 and; (viii) fixing January 9, 2014, as the deadline for filing any replies to any objections to the Plan
 8 (the “**Reply Deadline**”).

12 WHEREAS, the parties are currently working together to resolve the objections to the Plan
 13 and desire to continue the Voting Deadline, the Confirmation Objection Deadline, and the Reply
 14 Deadline as follows:

<u>Deadline</u>	<u>New Date</u>
Voting Deadline	December 27, 2013
Confirmation Objection Deadline	December 27, 2013
Reply Deadline	January 16, 2014

23 NOW THEREFORE, Stirling and the Debtors hereby stipulate and agree to the following, and
 24 by the Order attached to this Stipulation as **Exhibit A**, seek Court approval of the same:

26 IT IS HEREBY STIPULATED AND AGREED that the Voting Deadline and the
 27 Confirmation Objection Deadline are extended to December 27, 2013, and the Reply Deadline is
 28 extended to January 16, 2014

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2 Date: December 12, 2013
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4 /s/ Samuel A. Schwartz, Esq.
5 Samuel A. Schwartz, Esq.
6 Nevada Bar No. 10985
7 Bryan A. Lindsey, Esq.
8 Nevada Bar No. 10662
9 The Schwartz Law Firm, Inc.
10 6623 Las Vegas Blvd. South, Suite 300
11 Las Vegas, Nevada 89119
12 Attorneys for the Debtors

13 Date: December 12, 2013
14

15 /s/ J. Thomas Beckett, Esq.
16 J. Thomas Beckett, Esq.
17 (Admitted Pro Hac Vice)
18 Parsons Behle & Latimer
19 201 South Main Street, Suite 1800
20 Salt Lake City, Utah 84111
21 Attorneys for Stirling Mortimer
22 Global Property Fund PCC Limited
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1 Date: December 12, 2013
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3 /s/ Ryan A. Anderson, Esq.
4 Ryan A. Andersen, Esq.
5 Nevada Bar No. 12321
6 Lionel Sawyer & Collins
7 300 South 4th Street, Suite 1700
8 Las Vegas, Nevada 89101
9 Special Litigation Counsel for the Debtors

10 Submitted by:
11

12 Parsons Behle & Latimer
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14 By /s/ J. Thomas Beckett, Esq.
15 Attorneys for Stirling Mortimer
16 Global Property Fund PCC Limited
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EXHIBIT A

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8 PARSONS BEHLE & LATIMER
9 Michael R. Kealy, Bar No. 0971
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16 Attorneys for
17 Stirling Mortimer Global Property Fund PCC Limited

18 **UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA**

19 In re:) Case No.: 13-13969-BTB
20 Regal Property Holdings, Inc.)
21 Richard N. Roberts and Jane S. Roberts,) Chapter 11
22 Debtors.) Joint Administration With:
23) Case No.: 13-13968-BTB
24) Hearing: January 23, 2014, at 2:00 p.m.,
25) and January 24, 2014, at 9:00 a.m.

26 **ORDER APPROVING STIPULATION CONTINUING VOTING, OBJECTION,**
27 **AND REPLY DEADLINES WITH RESPECT TO THE DEBTORS' PLAN**

28 Stirling Mortimer Global Property Fund PCC Limited ("Stirling"), by and through its counsel
29 of record, Parsons Behle & Latimer, and the above-captioned debtors and debtors-in-possession (the
30 "Debtors"), by and through their counsel of record, The Schwartz Law Firm, Inc. and Lionel Sawyer
31 & Collines, having stipulated and agreed as provided for in that certain Stipulation (the
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1 “**Stipulation**”) Continuing Voting, Objection, and Reply Deadlines with Respect to the Debtors’ Plan
2 in the above-captioned bankruptcy case; and the Court having considered the Stipulation and finds
3 that the relief requested in the Stipulation is appropriate and sufficient cause exists to grant the relief;
4 and for good cause appearing, it is hereby—
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7 ORDERED that the Stipulation is APPROVED; and it is further
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9 ORDERED that the Voting and Objection Deadlines on the Debtors’ Plan will be extended to
10 December 27, 2013, and that the Reply Deadline will be extended to January 16, 2014.
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13 Submitted by:
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15 Parsons Behle & Latimer
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17 By /s/ J. Thomas Beckett, esq.
18 Attorneys for Stirling Mortimer
19 Global Property Fund PCC Limited
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the law firm of Parsons Behle & Latimer and that on the 12th day of December 2013, I filed a true and correct copy of the foregoing **STIPULATION TO EXTEND VOTING, OBJECTION, AND REPLY DEADLINES WITH RESPECT TO THE DEBTORS' PLAN** with the Clerk of the Court through the Court's CM/ECF system, which sent electronic notification to all registered users as follows:

**BMW FINANCIAL SERVICES,
NA, LLC FKA FINANCIAL
SERVICES VEHICLE TRUST
POLI & BALL PLC
3311 S. RAINBOW BLVD., STE 2
LAS VEGAS, NV 89146
702-380-8095
bkecf@poliball.com
Added: 08/13/2013
(Creditor)**

JAMES B. BALL
3311 SOUTH RAINBOW BLVD. #215
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(702) 380-8095
(702) 380-3001 (fax)
bkecf@poliball.com
Assigned: 08/13/13

**DEUTSCHE BANK NATIONAL
TRUST COMPANY**
Added: 06/06/2013
(Creditor)

GREGORY L. WILDE
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LAS VEGAS, NV 89107
(702) 258-8200
(702) 258-8787 (fax)
nvbk@tblaw.com
Assigned: 06/06/13

IRS
POB 21126
PHILADELPHIA, PA 19114
Added: 09/03/2013
(Creditor)

represented
by

ROLLIN G. THORLEY
110 CITY PARKWAY, STE 301
LAS VEGAS, NV 89106
(702) 868-5167
(702) 868-5440 (fax)
rollin.g.thorley@irs counsel.treas.gov
Assigned: 09/03/13

LIONEL SAWYER & COLLINS
Added: 06/18/2013
(Special Counsel)

REGAL PROPERTY HOLDINGS, INC.

4750 N. JENSEN STREET
LAS VEGAS, NV 89129-1606
Tax ID / EIN: 75-3236126

Added: 05/06/2013

(Debtor)

represented by 6623 LAS VEGAS BLVD. SO., STE 300
LAS VEGAS, NV 89119
bryan@schwartzlawyers.com
Assigned: 05/07/13

SAMUEL A. SCHWARTZ
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(702) 385-2741 (fax)
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Assigned: 05/06/13

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Assigned: 10/11/13

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Assigned: 05/08/13
TERMINATED: 05/21/13

JANE S ROBERTS

4750 N. JENSEN STREET
LAS VEGAS, NV 89129-1606

SSN / ITIN: xxxx-xx-1004

Added: 05/07/2013

TERMINATED: 05/21/2013

INTERESTED: 3
(Interested Party)

ANSWER

represented
by

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11 **JANE S. ROBERTS**
12 4750 N. JENSEN ST.
13 LAS VEGAS, NV 89129
Added: 05/21/2013
(Jnt Admin Debtor)

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represented by

BRYAN A. LINDSEY
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6 **RICHARD N ROBERTS**
7 4750 N. JENSEN STREET
8 LAS VEGAS, NV 89129
9 SSN / ITIN: xxx-xx-8517
10 *Added: 05/07/2013*
11 *TERMINATED: 05/21/2013*
12 *(Interested Party)*

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20 **RICHARD N. ROBERTS**
21 4750 N. JENSEN ST.
22 LAS VEGAS, NV 89129
23 *Added: 05/21/2013*
24 *(Jnt Admin Debtor)*

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**STIRLING MORTIMER GLOBAL
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PO BOX 225
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4HY
*Added: 05/10/2013
(Interested Party)*

represented
by

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Assigned: 05/16/13
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SYNTERGY SOTHEBY'S
INTERNATIONAL REALTY

Added: 10/21/2013

(Realtor)

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USTPRegion17.lv.ecf@usdoj.gov
Added: 05/06/2013
(U.S. Trustee)

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Brian M. Rothschild
Employee of Parsons Behle & Latimer